# **Privacy Policy**

Effective as of 1.26.21

Something we haven't covered? Email us and we'll get back to you!

Change respects your privacy and is committed to protecting your personal data.

This privacy policy ("**Privacy Policy**") describes the privacy practices of GetChange Corp. d/b/a Change ("**Change**", "we", "us", or "our"), and how we handle personal information we collect about you when you visit our site https://Getchange.io (the "**Site**") and/or our mobile application ("**App**"), and through any other website or app that we own or control and which posts to this Privacy Policy, and through other interactions and correspondence with you (collectively, the "**Service**").

## THE DATA WE COLLECT ABOUT YOU

When you use the Service, you may provide Change with two main types of information: (i) personally identifiable information that you knowingly choose to disclose, which is collected on an individual basis, and/or (ii) general user information that does not contain personally identifiable information, which is collected on an aggregate basis when users use the Service. We collect information from you when you (a) use and/or access the Service, (b) open and/or respond to our emails, (c) contact Change, (d) visit any page online that displays our content, (e) make purchases through the Service, and/or (f) provide information to any of our vendors.

#### **Data You Choose to Provide**

Personal information you may provide to us through the Service may include:

- "Identity Data," including first name, last name, username or similar identifier and title.
- "Contact Data," including email address and telephone numbers.
- "<u>Transaction Data</u>," including payment details of transactions to and from you and details of products and services you have purchased from our retailer
- "Charity Data," including when making a purchase through a retailer's site which includes Change's Shopify Integration program, which captures additional information such as the charity you select to support at the time of purchase.
- "<u>Device Data,</u>" including internet protocol (IP) address, your login data, browser type and version, connection speed, time zone setting and location, browser plug-in types and versions, operating system and platform and other devices you use to access this Service.

- "Profile Data," including your username and password, avatar, purchases or orders made by you, donations, your interests, preferences, feedback and survey responses.
- "<u>Usage Data,</u>" including information about how you use our Service, products and services and/or incoming (referral) sites if applicable and page views.
- "Marketing and Communications Data," including your preferences in receiving marketing from us and our third parties, and your communication preferences.
- "Content Data," including any content which you upload onto the Service, such as comments and other text or images that contain personal data, and your platform of choice for any shareable content.
- "Other Data" which is not specifically listed here, but which we will use in accordance with this Privacy Policy or as otherwise disclosed at the time of collection.

# **Data That We Automatically Collect**

When you access or use the Service, we may automatically collect information about you, including:

- Analytics: Change uses third party analytic software to gather statistics and usage trends for product and service improvement purposes and so the information you provide to us will be disclosed to such third party providers. Our Service may record data from your phone, tablet, and/or computer, such as how frequently you use the Service, what actions you take and performance data.
- <u>Precise Geolocation Information</u>: When you use the Service, you may be asked to provide your precise geolocation information, such as your city and state. Change will use such information as described herein.
- Other Tracking Technologies: We may supplement information you provide to us with information from other sources, such as information to validate and/or update your address and/or other demographic information. This information is used to maintain the accuracy of information on the Service and for internal analysis. We may also use clear gifs, pixel tags and web beacons, which are tiny graphic images placed on website pages and/or in our emails that allow us to determine whether you have performed specific actions and are further used to track online movements of our users. In contrast to Cookies, which are stored on your computer's hard drive, clear gifs are embedded invisibly on web pages. We do not tie the information gathered by clear gifs to your personally identifiable information.
- <u>Third Party Services</u>: To support the services we provide to you, we may use services hosted by third parties. The Service may collect information sent by a browser as part of a web page request, including 'Internet Protocol' addresses, browser software, and/or clickstream patterns. If such third party services collect

- information, they do so anonymously without identifying individual visitors. However, we may link the information we record using tracking technology to personal information and data we collect. In addition, we may allow third parties who list services to use Cookies in connection with your use of the Service. Such third parties may collect and store the same type of information and use it similarly to Change, as described herein.
- Cookies: Our Service uses Cookies and similar technologies to distinguish you from other users of our Service. A "Cookie" is a small file of letters and numbers that we store on your browser or the hard drive of your computer, mobile phone or other device, and allows us to recognize you as a user when you return to our website using the same device and web browser and enables Change to collect information about how you use our Service. This helps us to provide you with a good experience when you browse our Service and may also use such technologies to track you across the Internet and to display targeted advertisements to you on our Service and third party websites and social media platforms based on your preferences and likely interests. Information gathered through Cookies may include the date and time of visits, the pages viewed, and time spent using the Service.

## **How is Your Personal Data Collected?**

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together in the following subsections:

- <u>Direct interactions</u>. You may give us your personally identifiable information by filling in forms or by corresponding with us by post, phone, email, online or otherwise. This includes personal data you provide when you (a) sign up for our products or services; (b) complete a form on our Service requesting us to contact you; (c) create an account on our Service; (d) subscribe to our service or publications; (e) request marketing to be sent to you; (f) enter a competition, promotion or survey; and/or (g) provide us with feedback.
- <u>Financial Transactions</u>. You may give us banking and financial information to provide payment to an organization you manage or for a fundraiser you manage through our Service.
- <u>Uploaded Data</u>. You may upload Content Data on our Service when you use the Service and our services.
- <u>Automated technologies & Interactions</u>. As you interact with our Service, we may automatically collect technical data about your equipment, and Usage Data about your browsing actions and patterns. We collect this data by using Cookies and other similar technologies.
- <u>Third Parties or Publicly Available Sources</u>. We may receive personal data about you from various third parties and public sources, including without limitation (a)

technical data from analytics providers, advertising networks and/or search information providers, (b) identity, profile and contact data from publicly available sources and/or (c) identity, profile and contact data from data providers who obtain such data from publicly available sources.

## **HOW WE USE YOUR PERSONAL DATA**

We use your personal information for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

## To operate the Service.

- Administer and protect our business and this Service (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)
- Provide information about our products and services
- Register you as a new customer/user
- Establish and maintain your user profile
- Communicate with you about the Service (including by sending you announcements, updates, security alerts, and support and administrative messages)
- Respond to your requests, questions and feedback
- Enable you to partake in a prize draw, competition or complete a survey

**For research and development.** We use data analytics to improve our Service, products and services, marketing, customer relationships and experiences and to develop new products and services.

**To send you marketing and promotional communications.** We may send you marketing communications as permitted by law, such as when we desire to advertise additional promotions and benefits of our services to you in the event you are a retailer that has elected to sign up under Change 'Change Commerce' program from a partner retailer website, or to make suggestions and recommendations to you about goods or services that may be of interest to you. You will have the ability to opt-out of our marketing and promotional communications as described in the "Opt out of marketing" section below.

#### To facilitate donations.

- Place a donation through the Service
- Receive a donation from a purchase made on retailer's website in the Change Commerce program
- Process creating a fundraiser or collect funds available for your organization

**To display advertisements.** We may work with advertising partners to deliver relevant Service content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you. These advertisements are delivered by our advertising partners and may be targeted based on your use of the Services or your activity elsewhere online. To learn more about your choices in connection with advertisements, please see the section below titled "Advertising Choices."

**To comply with law.** We may use your personal information as we believe appropriate to comply with a legal or regulatory obligation, such as to respond to subpoenas or requests from government authorities.

# For compliance, fraud prevention and safety.

- Enforce our terms and conditions that govern the Service.
- Protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.
- Where it is necessary for our legitimate interests, your interests or those of a third party, and fundamental rights do not override those interests.

**With your consent.** In some cases we may specifically ask for your consent to collect, use or share your personal information, such as when required by law or to share with a partner.

To create anonymous, aggregated or de-identified data. Change may aggregate and/or de-identify your information so that the information no longer relates to you individually, which includes without limitation demographic or statistical data, such as how many visitors visit a specific page, how long they stay on that page and which links, if any, they click on. This information represents a generic overview of our users, including their collective habits. Information collected in the aggregate is not associated with you as an individual. We may share aggregated data and/or de-identified data in the aggregate with third parties and such data is not subject to this Privacy Policy and may be disclosed to third parties without limitation and for any purpose. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

#### **HOW WE SHARE YOUR PERSONAL INFORMATION**

<u>Service Providers</u>. We may share your personally identifiable information as well as information from tools like Cookies, log files, and device identifiers and location data (such as Usage Data, referring/exit pages and URLs, platform types, number of clicks,

etc.), with employees, contractors, and/or agents that help Change provide the Service and related services to you (collectively, the "Service Providers") and by accessing and/or using the Service and related services you consent to our sharing such information. Our Service Providers will be given access to your information as is reasonably necessary to provide the Service and related services, including without limitation, for system administration, customer service tools, professional advisers, third party advertising partners and/or third party analysts. We strive to use commercially acceptable means to protect your personal information. If Service Providers acquire confidential or proprietary information belonging to Change or its customers, such information is required to be handled in confidence and may not be disclosed to unauthorized third parties. Service Providers who violate our security and safe maintenance of data policies are subject to appropriate discipline including, but not limited to, termination. We will not share your personally identifiable information in ways unrelated to those described in this Privacy Policy without providing you with an opportunity to opt out of such use or otherwise prohibit such unrelated use. Certain Service Providers will automatically collect non-identifying information about your use of the Service by using Cookies and other technologies as similarly used by Change.

<u>Professional Advisors</u>. We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

<u>Donation Partners</u>. Change has partnered with CharityVest, a United States 501(c)(3) charity that raises new funds for charities through technology. As part of providing the Service and related products and/or services and processing donations, we may disclose personal data, including your name, email address, and physical address (if on file) with our affiliates, partners and charities who are enrolled with Change that benefit from your donations and by accessing and/or using the Service and related services you consent to our sharing such information. We may also provide personal information about you to our third party service providers for the purpose of receiving and processing payments. These third parties are prohibited from using your personal information for any other purpose than what is disclosed in this Privacy Policy. When you use our Service and/or process donations, we may also disclose your name and contact information to the nonprofit organization that you have designated. Under certain limited circumstances, we may be subject to legal requirements to disclose information collected through our Service and the related CharityVest services, and our policy is to comply fully with all such legal requirements. Please note that Change may use and disclose non-personal data without restriction. If you do not want us to make such disclosures required by law, or to allow Change to use non-personal data without restriction, you must not use the Service and/or related services.

<u>Business Transfers</u>. If we sell or otherwise transfer part or all of Change or our assets to another organization (e.g., in the course of a transaction such as a merger, acquisition, bankruptcy, dissolution, liquidation, etc.), your information, such as name and email address, user content and/or any other information collected through the Service, may be among the items sold and/or transferred and by accessing and/or using the Service and related services you consent to our sharing such information.

<u>Third-Party Platforms and Social Media Networks</u>. If you have enabled features or functionality that connect the Service to a third-party platform or social media network (such as by logging in to the Service using your account with the third-party, providing your API key or similar access token for the Service to a third-party, or otherwise linking your account with the Service to a third-party's services), we may disclose the personal information that you authorized us to share. We do not control the third party's use of your personal information.

<u>Public Forums</u>. Any information you may disclose on our Service, such as in blogs, on message boards, or on other public areas on the Service, becomes public information. Please exercise caution when disclosing personal information in these public areas. We are not responsible for maintaining the confidentiality of such information. The Service may also allow you to connect with us on, share on, and use third-party websites, applications and services. Please be mindful of your personal privacy needs as you choose what to share and make public. As a reminder, we do not control the privacy practices of third parties, so please contact such third parties to learn more about their privacy practices.

#### YOUR INFORMATION CHOICES

In this section, we describe the rights and choices available to all users.

<u>Access to Information</u>. In the event you need to access certain information that you have provided to Change, you can visit your account settings portion of the Service.

Opt Out of Marketing Communications. You will receive marketing communications from us if you have requested information from us and/or purchased products or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing. You will receive marketing communications from organizations you have supported, favorited, and/or made donations to using the Change or its 'Change Commerce' platforms. You have the right to withdraw consent to marketing at any time by following the opt-out links on marketing messages sent to you or by

otherwise contacting us. You may continue to receive service-related and other non-marketing emails.

<u>Privacy Settings and Location Data</u>. Users of our App have the choice whether to allow us to access your precise location data. Your device settings may provide the ability for you to revoke our ability to access location data.

<u>Cookies</u>. You can choose to have your computer notify you each time a website places a Cookie on your device, or you can choose to decline Cookies altogether. You may make these adjustments through your browser or operating system settings. Since browsers and operating systems are different, look at your browser's help menu to learn how to change your tracking settings or Cookie preferences. If you limit tracking or decline Cookies, you will not be able to use the Service. If you wish to prevent your data from being used by 'Google Analytics', 'Google' has developed the 'Google Analytics' opt-out browser add-on available here. On your mobile device, you can adjust your privacy and advertising settings to limit your tracking for advertising or control whether you receive more relevant advertising.

<u>Advertising Choices</u>. You can limit use of your information for interest-based advertising by:

- Browser settings. Blocking third party cookies in your browser settings.
- Privacy browsers/plug-ins. By using privacy browsers or ad-blocking browser plugins that let you block tracking technologies.
- Ad industry tools. Opting out of interest-based ads from companies participating in the following industry opt-out programs:
  - Network Advertising Initiative:
     <a href="http://www.networkadvertising.org/managing/opt\_out.asp">http://www.networkadvertising.org/managing/opt\_out.asp</a>
  - $\circ \quad \hbox{Digital Advertising Alliance: optout.aboutads.info}$
  - AppChoices mobile app, available at <a href="https://www.youradchoices.com/appchoices">https://www.youradchoices.com/appchoices</a>, which will allow you to optout of interest-based ads in mobile apps served by participating members of the Digital Advertising Alliance.
- Mobile settings. Using your mobile device settings to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

You will need to apply these opt-out settings on each device from which you wish to opt-out.

<u>Do Not Track</u>. Note that the Service may not recognize 'Do Not Track' headers or requests from some or all browsers. To find out more about "Do Not Track," please visit <a href="http://www.allaboutdnt.com">http://www.allaboutdnt.com</a>.

Third-Party Platforms or Social Media Networks. If you choose to connect to the Service via a third-party platform or social media network, you may have the ability to limit the information that we may obtain from the third-party at the time you login to the Service using the third-party's authentication service or otherwise connect your account. Subsequently, you may be able to control your settings through the third-party's platform or service. If you withdraw our ability to access certain information from a third-party platform or social media network, that choice will not apply to information that we have already received from that third-party.

<u>Choosing Not to Share Your Personal Information</u>. Where we are required by law to collect your personal information, or where we need your personal information in order to provide the Service to you, if you do not provide this information when requested (or you later ask to delete it), we may not be able to provide you with our services. We will tell you what information you must provide to receive the Service by designating it as required at the time of collection or through other appropriate means.

#### **THIRD-PARTY LINKS**

This Service may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We are not responsible for the practices employed by any websites and/or services linked to and/or from the Service and do not control these third-party websites. Please remember that when you use a link to go from the Service to another website and/or service, our Privacy Policy does not apply to such third-party websites and/or services. Your browsing and interaction on any third-party website and/or service, including those that have a link on the Service, are subject to such third party's own rules and policies. In addition, you agree that we are not responsible and do not have control over any third-parties that you authorize to access your personal information. If you are using a third-party website and/or service and you allow them to access your personal information, you do so at your own risk. When you leave our Service, we encourage you to read the privacy policy of every website you visit.

#### **DATA SECURITY**

We use commercially reasonable efforts to secure your personal information from unauthorized access to and/or unauthorized alteration, disclosure and/or destruction and we have implemented technical and organizational security measures designed to protect the personal data provided via the Service from loss, misuse and unauthorized

access, disclosure, alteration or destruction. Because the internet is not a completely secure environment, Change cannot warrant the security of any information you transmit to Change or guarantee that information on the Service may not be accessed, disclosed, altered, and/or destroyed by breach of any of our physical, technical and/or managerial safeguards. Please do your part to help Change. You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to emails between you and Change, at all times. Please limit your access to your computer and/or mobile device and/or browser by signing off after you have finished accessing your account. We are not responsible for the functionality, privacy and/or security measures of any other organization.

## **INTERNATIONAL DATA TRANSFERS**

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

#### CHILDREN'S PRIVACY

Protecting children's privacy is important to us. We do not direct the Service to, nor do we knowingly collect any personal information from, children under the age of thirteen (13). If we learn that we have collected personal information from a child under age thirteen (13), we will delete such information as quickly as possible. If you believe that a child under the age of thirteen (13) may have provided us personal information, please contact us and we will delete such information from our databases to the extent required by law.

## **CHANGES TO THIS PRIVACY POLICY**

This Privacy Policy may change from time to time, so please check this Privacy Policy regularly so that you are aware of any such changes. We will update the 'Last Modified' date above and may provide you additional forms of notice of modifications and/or updates as appropriate under the circumstances. You can determine when this Privacy Policy was last revised by referring to the date it was "Last Modified" above. If you disagree with any changes to this Privacy Policy and do not wish your information to be subject to the revised Privacy Policy, you will need to stop using the Service and/or App. Your continued use of the Service after any modification to this Privacy Policy will constitute your acceptance of such modifications and/or updates.

## **HOW TO CONTACT US**

Please contact us with any questions and/or concerns or send such information in writing to: Change, 548 Market St PMB 9203, San Francisco, California 94104-5401 US.